

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ZACK BRANDT IVIE and
SARAH ELIZABETH IVIE,

Defendants.

SEALED

Case No.

CR 21-375-RAW

FILED

DEC 08 2021

By PATRICK KEANEY
Clerk, U.S. District Court
Deputy Clerk

INDICTMENT

The Federal Grand Jury charges:

COUNT ONE

CHILD ABUSE IN INDIAN COUNTRY
[18 U.S.C. §§ 1151, 1152, 2 & 21 Okla. Stat. 843.5(A)]

Between on or about November 11, 2019 and December 13, 2019, within the Eastern District of Oklahoma, in Indian Country, the defendant, **SARAH ELIZABETH IVIE**, did willfully and maliciously cause and threaten harm, fail to protect from harm and threaten harm, torture and injure G.I., an Indian, all while the defendant was responsible for the health, safety and welfare of G.I., a child under the age of eighteen, in violation of Title 18, United States Code, Sections 1151 and 1152, 2 and Title 21, Oklahoma Statutes, Section 843.5(A).

COUNT TWO

CHILD NEGLECT IN INDIAN COUNTRY
[18 U.S.C. §§ 1151, 1152, 2 & 21 Okla. Stat. 843.5(C)]

Between on or about November 11, 2019 and December 13, 2019, within the Eastern District of Oklahoma, in Indian Country, the defendant, **SARAH ELIZABETH IVIE**, did willfully and maliciously fail and omit to provide G.I., an Indian, adequate nurturance and

affection, food, clothing, shelter, sanitation, hygiene, medical care and supervision, all while the defendant was responsible for the health, safety and welfare of G.I., a child under the age of eighteen, in violation of Title 18, United States Code, Sections 1151, 1152, 2 and Title 21, Oklahoma Statutes, Section 843.5(C).

COUNT THREE

**CHILD ABUSE IN INDIAN COUNTRY
[18 U.S.C. §§ 1151, 1153, 2 & 21 Okla. Stat. 843.5(A)]**

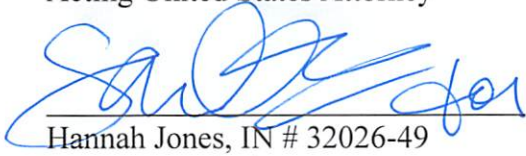
Between on or about November 11, 2019 and December 13, 2019, within the Eastern District of Oklahoma, in Indian Country, the defendant, **ZACK BRANDT IVIE**, an Indian, did willfully and maliciously cause and threaten harm, fail to protect from harm and threaten harm, torture and injure G.I., all while the defendant was responsible for the health, safety and welfare of G.I., a child under the age of eighteen, in violation of Title 18, United States Code, Sections 1151 and 1153, 2 and Title 21, Oklahoma Statutes, Section 843.5(A).

COUNT FOUR

**CHILD NEGLECT IN INDIAN COUNTRY
[18 U.S.C. §§ 1151, 1153, 2 & 21 Okla. Stat. 843.5(C)]**

Between on or about November 11, 2019 and December 13, 2019, within the Eastern District of Oklahoma, in Indian Country, the defendant, **ZACK BRANDT IVIE**, an Indian, did willfully and maliciously fail and omit to provide G.I., adequate nurturance and affection, food, clothing, shelter, sanitation, hygiene, medical care and supervision, all while the defendant was responsible for the health, safety and welfare of G.I., a child under the age of eighteen, in violation of Title 18, United States Code, Sections 1151, 1153, 2 and Title 21, Oklahoma Statutes, Section 843.5(C).

CHRISTOPHER J. WILSON
Acting United States Attorney

A handwritten signature in blue ink, appearing to read 'Hannah Jones', is written over a horizontal line.

Hannah Jones, IN # 32026-49
Assistant United States Attorney

A TRUE BILL:

Pursuant to the E-Government Act,
the original indictment has been filed
under seal in the Clerk's Office.

s / Foreperson

FOREPERSON OF THE GRAND JURY